

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, et al.,)	Case No. 3:23-cv-209-SPM
Plaintiffs,)	**designated Lead Case
)	
v.)	
)	
KWAME RAOUL, et al.,)	
Defendants,)	
)	
DANE HARREL, et al.,)	Case No. 3:23-cv-141-SPM
Plaintiffs,)	
)	
v.)	
)	
KWAME RAOUL, et al.,)	
Defendants,)	
)	
JEREMY W. LANGLEY, et al.,)	Case No. 3:23-cv-192-SPM
Plaintiffs,)	
)	
v.)	
)	
BRENDAN KELLY, et al.,)	
Defendants,)	
)	
FEDERAL FIREARMS LICENSEES OF ILLINOIS, et al.,)	Case No. 3:23-cv-215-SPM
Plaintiffs,)	
)	
v.)	
)	
JAY ROBERT “J.B.” PRITZKER, et al.,)	
Defendants.)	
)	

DECLARATION OF STEPHEN KNUTSON

1. I, Stephen Knutson, am a current resident of Illinois and member of Gun Owners of America, Inc., Plaintiff in the above-titled action. I am over the age of 18 years old and make this declaration of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true. If called as a witness, I could and would

testify competently to the truth of the matters set forth herein.

2. I am not a police officer, retired police officer, prison warden, current member of the armed forces or national guard, nor do I work in armed security or private security contracting. I am thus not exempt from Protect Illinois Communities Act, House Bill 5471 (“PICA”)’s restrictions.

3. I have been directly harmed by PICA by:

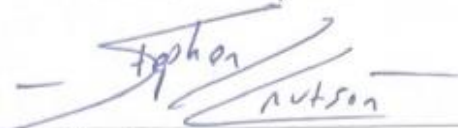
- a. losing the possession and use within Illinois of various firearms that I own because I removed them from Illinois because PICA restricts them and I did not wish to submit an endorsement affidavit for (i.e., register) those firearms;
- b. paying out-of-state storage fees solely to maintain ownership of my firearms that PICA restricts without violating PICA or submitting an endorsement affidavit for (i.e., register) those firearms; and
- c. being unable to obtain in Illinois additional firearms and ammunition that I have been wanting to acquire to use in Illinois for lawful purposes.

4. Prior to January 10, 2023, I owned and possessed at my home in Illinois firearms that PICA restricts. I used those firearms for various lawful purposes, including training and defense of myself, my family, and my home. Desiring to keep my firearm ownership private, I moved multiple firearms that PICA restricts out of Illinois and am paying to have them stored, as I did not wish to disclose the personal information required in an endorsement affidavit. The items moved out of state include at least one AR-platform rifle that accepts detachable magazines and has at least a pistol grip and adjustable stock. I have thus entirely lost the use of those firearms within the State of Illinois, where I reside, for self-defense and for use in recreational shooting, as well as for training.

5. I recently saw an advertisement on an auction for a .50 BMG rifle that I desire to add to my collection but did not bid on the rifle because PICA prohibits the acquisition and possession of such firearms and their ammunition.

6. But for fear of prosecution under PICA for doing so, I would bring every firearm that I removed from the State because of PICA back into Illinois and would acquire new firearms and parts that PICA prohibits, including a .50 BMG rifle and its ammunition.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 19, 2024, in Rockford, Illinois.



Stephen Knutson
Declarant

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2024, an electronic PDF of **DECLARATION OF STEPHEN KNUTSON** was sent by electronic mail to the following registered attorneys participating in the case:

Counsel for State Defendants Attorney General Kwame Raoul, Governor J.B. Pritzker, and ISP Director Brendan Kelly

Christopher G. Wells
christopher.wells@ilag.gov
Darren Kinkead
darren.kinkead@ilag.gov
Kathryn Muse
kathryn.muse@ilag.gov
Laura K. Bautista
laura.bautista@ilag.gov
John Hazinski
john.hazinski@ilag.gov
Michael M. Tresnowski
michael.tresnowski@ilag.gov
Stefanie Krajewski
stefanie.krajewski@ilag.gov
Office of the Attorney General
115 S. LaSalle St.
Chicago, IL 60603

Counsel for Barnett Plaintiffs

Paul D. Clement
paul.clement@clementmurphy.com
Erin E. Murphy
erin.murphy@clementmurphy.com
Matthew D. Rowen
matthew.rowen@clementmurphy.com
Nicholas M. Gallagher
nicholas.gallagher@clementmurphy.com
Nicholas Aquart
nicholas.aquart@clementmurphy.com
Clement & Murphy, PLLC
706 Duke Street
Alexandria, VA 22314

Gary C. Pinter
gpinter@smbtrials.com
Swanson, Martin & Bell, LLP
103 W. Vandalia Street, Suite 215
Edwardsville, IL 62025

Andrew A. Lothson
alothson@smbtrials.com
James Vogts
jvogts@smbtrials.com
Swanson, Martin & Bell, LLP
330 N. Wabash, Suite 3300
Chicago, IL 60611

Counsel for Harrel Plaintiffs

David G. Sigale
dsigale@sigalelaw.com
Law Firm of David G. Sigale, P.C.
55 West 22nd Street, Suite 230
Lombard, IL 60148

David H. Thompson
dthompson@cooperkirk.com
Peter A. Patterson
ppatterson@cooperkirk.com
William V. Bergstrom
wbergstrom@cooperkirk.com
Cooper & Kirk
1523 New Hampshire Avenue, NW
Washington, D.C. 20036

Counsel for Langley Plaintiffs

Thomas G. Maag
tmaag@maaglaw.com
Peter J. Maag
lawmaag@gmail.com
Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095

***Counsel for Defendant Cole Shaner, in his official
capacity as State's Attorney for Crawford County,
Illinois***

Keith B. Hill
khill@heyloyster.com
edwecf@heyloyster.com
HEYL, ROYSTER, VOELKER & ALLEN, P.C.
105 West Vandalia, Suite 100, Mark Twain Plaza III
Edwardsville, IL 62025 0467

Counsel for Randolph County Defendants

James E. Godfrey, Jr.
jgodfrey@evans-dixon.com
Kerry B. Banahan
kbanahan@evans-dixon.com
Katherine F. Asfour
kasfour@evans-dixon.com
Beth Pani
bpani@evans-dixon.com
211 N. Broadway, Suite 2500
St. Louis, Missouri 63102

Counsel for Defendants, James Gomric, in his official capacity as State's Attorney of St. Clair County, Illinois and Richard Watson, in his official capacity as Sheriff of St. Clair County, Illinois

Thomas R. Ysursa
try@bhylaw.com
BECKER, HOERNER, & YSURSA, P.C.
5111 West Main Street
Belleville, IL 62226

Dated: July 19, 2024

s/ Laura Palmerin
Laura Palmerin